

Message

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Sent: 1/22/2016 4:25:23 PM
To: Wayne Miller [Miller.Wayne@azdeq.gov]; Davis, Eva [Davis.Eva@epa.gov]; Davis, Eva [Davis.Eva@epa.gov]
CC: steve [steve@uxopro.com]; Bo Stewart [Bo@praxis-enviro.com]; Dan Pope [DPope@css-dynamac.com]
Subject: RE: 2016-1-21 - wafb - ADEQ will piggyback on EPA SEE continuation requests - ST012 SEE

Wayne

I understand Amec is planning to continue steam injection through end of February. I didn't hear on the call yesterday that they expect to begin demobilization next week. I would expect that to be premature and risky. But you are closer and better able to see what is actually going on.

The next set of comments due will be for the EBR workplan which also has to be approved. Have you sent comments yet? I am ok with sending a joint agency letter on shutdown criteria, provided we are all in agreement with all of the comments being provided. That being the case we'll need to take a team approach to reviewing the comments prepared and may need a call to discuss. So forward your input to everybody.

From: Wayne Miller [mailto:Miller.Wayne@azdeq.gov]
Sent: Thursday, January 21, 2016 12:04 PM
To: d'Almeida, Carolyn K. <dAlmeida.Carolyn@epa.gov>; Davis, Eva <Davis.Eva@epa.gov>
Cc: steve <steve@uxopro.com>; Bo Stewart <Bo@praxis-enviro.com>
Subject: 2016-1-21 - wafb - ADEQ will piggyback on EPA SEE continuation requests - ST012 SEE

Thank you for the work you and Eva are doing on the SEE shut down rebuttal. To quickly respond to AMEC/Terra-Therm plans for SEE ending Feb 2016, I do not see ADEQ developing an individual SEE-continuation request letter. My conceptual plan is to have ADEQ lend support (and maybe a few interjections) to any EPA correspondence. In consideration that a timely response is of the essence, one EPA-authored letter is probably best for the regulatory agency voice. I have assumed that Terra-Therm/AMEC are likely to begin scheduling boiler de-mob by the end of next week in order to have the cranes and trucks ready to roll right after the final de-pressurization in Feb. I believe that EPA is much further along this week with an Agency opinion letter that may persuade AMEC to retain the SEE injection longer.

I believe Bo Stewart (Praxis) and Steve Willis (UXO Pro) will send me SEE continuation opinions by early next week. I will forward to your attention for EPA evaluation for inclusion into an EPA letter. Please let me know if this is not workable.

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